

New York Greater Metropolitan Area chapter of the Internet Society (ISOC-NY)
<http://isoc-ny.org>

Feb 28 2007

Comments to FTC Public Workshop on Broadband Connectivity Competition Policy

Dear Chairman Majoras, Workshop Members,

Here at ISOC-NY we have followed this workshop, and the subsequent comments with great interest.

The Internet Society (ISOC) was founded in 1992 with the mission 'to assure the open development, evolution and use of the Internet for the benefit of all people throughout the world' and is the parent organization of the Internet Engineering Task Force (IETF) and the Internet Architecture Board (IAB), which between them set the global standards upon which the Internet is based.

We appreciate the FTC's efforts to get to grips with issues that certainly threaten that 'open-ness' with respect to the USA.

Our members have raised the following points:

That the bodies that oversee the processes of Internet standards-making have not been given appropriate participation in the discussion.

That the very process of Internet standards-making is at risk in the Network Neutrality debate, because the flexibility of the Internet transport and the diversity of applications that are made possible by it may very easily be affected by practices that would affect the transport.

That the advantages of the existing protocols -- in particular the application flexibility of the Internet Protocol -- have not been acknowledged adequately in the debate.

That in order to address policy questions related to Network Neutrality a distinction needs to be drawn between the nature and advantages of existing protocols and practices, and various practices that are being proposed.

It is generally agreed that one reason Network Neutrality is an issue at all is due to past policies that have diminished robust competition in high-speed internet access, and we would encourage the FTC to do their best to promote such competition, including Municipal Access, and the development of new technologies such as 'Broadband over Power Lines' (BPL) and WIMAX.

The comments to the workshop by R. Bancroft, suggesting that the FTC encourage ISP's to voluntarily disclose their existing packet management practices, were well received.

Thanks for your attention,

Joly MacFie